

EXHIBIT 2

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

PRINCETON DIGITAL IMAGE
CORPORATION,

Plaintiff,

v.

HEWLETT-PACKARD, et al.;

Defendants.

Civil Action No. 1:12-cv-779 (RJS)

AND RELATED COUNTERCLAIMS

**DEFENDANT HEWLETT-PACKARD COMPANY'S
SECOND SUPPLEMENTAL DISCLOSURE STATEMENT**

Pursuant to Federal Rule of Civil Procedure 26(a)(1), Defendant Hewlett-Packard Company ("HP") hereby submits this Second Supplemental Disclosure Statement. HP makes this Supplemental Disclosure Statement based upon its current knowledge and information reasonably available at this time. HP's investigation is ongoing, and discovery is not yet complete. HP reserves the right to supplement or correct the disclosures as information is acquired pursuant to Federal Rule of Civil Procedure 26(e).

(A) Persons Having Relevant Knowledge/Brief Statement

Pursuant to Federal Rule of Civil Procedure 26(a)(1), HP identifies the following persons with knowledge of relevant facts that HP may use in support of its claims and defenses. The issues are not yet fully developed because HP's investigation is ongoing. Accordingly, HP reserves the right to identify additional individuals at a later date.

HP requests that Princeton Digital Image Corporation ("PDIC") not contact any of the individuals listed below who are current or former employees of HP. Any contact of such individuals should be made through HP's counsel.

(1) Employees Having Relevant Knowledge

Name	Contact Information	Summary of Information Known
David Staudacher*	Hewlett-Packard Co. 3404 East Harmony Road Ft. Collins, CO 80528	Design, structure, function and operation of accused HP digital cameras.
Will Brake*	c/o DLA Piper LLP (US) 401 B Street, Ste. 1700 San Diego, CA 92101	Design, structure, function and operation of accused HP digital cameras.
Patrick Chase*	c/o DLA Piper LLP (US) 401 B Street, Ste. 1700 San Diego, CA 92101	Design, structure, function and operation of accused HP inkjet all-in-one printers.
Curt Behrend	Hewlett-Packard Co. 16399 W. Bernardo Dr. San Diego, CA 92127	Design, structure, function and operation of accused HP inkjet all-in-one printers; value/cost of allegedly infringing functionality within accused products.
Fahad Ahmad*	c/o DLA Piper LLP (US) 401 B Street, Ste. 1700 San Diego, CA 92101	Design, structure, function and operation of accused HP inkjet all-in-one printers.
Brad Larson	Hewlett-Packard Co. 11311 West Chinden Blvd. Boise, ID 83714	Design, structure, function and operation of accused HP laser multi-function printers; value/cost of allegedly infringing functionality within accused products.
Greg Brake	Hewlett-Packard Co. 3404 East Harmony Road Ft. Collins, CO 80528	Design, structure, function and operation of accused HP scanners.
Hal Hansen	Hewlett-Packard Co. 3404 East Harmony Road Ft. Collins, CO 80528	Design, structure, function and operation of accused HP scanners.
Dave Zito	Hewlett-Packard Co. 16399 W. Bernardo Dr. San Diego, CA 92127	Design, structure, function and operation of accused HP scanners and accused photo editor software; value/cost of allegedly infringing functionality within accused products.
Mimi Dong	Hewlett-Packard Co. 3404 East Harmony Road Ft. Collins, CO 80528	Design, structure, function and operation of accused HP scanners.

Name	Contact Information	Summary of Information Known
David Lawson	Hewlett-Packard Co. 3404 East Harmony Road Ft. Collins, CO 80528	Design, structure, function and operation of accused HP scanners; value/cost of allegedly infringing functionality within accused products.
Manas Chaliha	Hewlett-Packard Co./Snapfish 303 Second Street South Tower, Suite 500 San Francisco, CA 94107	Design, structure, function and operation of accused HP/Snapfish photo editor products.
Pieter van Zee	Hewlett-Packard Co. 1000 Northeast Circle Blvd. Corvallis, OR 97330	Design, structure, function and operation of accused HP/Snapfish photo editor products.
Ralph Morales	Hewlett-Packard Co. 16399 W. Bernardo Dr. San Diego, CA 92127	Financial information related to accused HP/Snapfish photo editor products.
Steve Stoecker*	c/o DLA Piper LLP (US) 401 B Street, Ste. 1700 San Diego, CA 92101	Design, structure, function and operation of accused HP digital cameras; value/cost of allegedly infringing functionality within accused products.
Mike Schlossberg	Hewlett-Packard Co. 3000 Hanover Street Palo Alto, CA 94304	Financial information related to accused inkjet all-in-one printers and cameras.
Michael Bordoni	Hewlett-Packard Co. 3000 Hanover Street Palo Alto, CA 94304	Financial information related to accused inkjet all-in-one printers.
Lisa Hadjinian	Hewlett-Packard Co. 3000 Hanover Street Palo Alto, CA 94304	Financial information related to accused inkjet all-in-one printers and cameras.
Barbara Poston	Hewlett-Packard Co. 11311 West Chinden Blvd. Boise, ID 83714	Financial information related to accused laser multi-function printers and scanners.

Name	Contact Information	Summary of Information Known
Paolo Fontani	Hewlett-Packard Co. 3404 E Harmony Rd. Fort Collins, CO 80528	Design, structure, function and operation of accused OEM cameras; USB still device class specification and USB mass storage device class specification; PIMA 15740:2000 and ISO 15740.
Amol Pandit	Hewlett-Packard Co. 3404 E Harmony Rd. Fort Collins, CO 80528	Design, structure, function and operation of accused OEM cameras.
Wilson Wong	Hewlett-Packard Co. 450 Alexandra Road Singapore 119960	Design, structure, function and operation of accused OEM cameras.

Persons whose names are marked with an asterisk (*) are former employees of HP and should be contacted only through HP's outside counsel of record DLA Piper LLP (US). Because of PDIC's unreasonable delay in bringing this lawsuit, other former employees are expected to have knowledge of relevant facts and will be identified as HP learns of their knowledge and identities, as discovery and inquiry continue.

(2) Other Persons Having Relevant Knowledge

Name	Contact Information	Summary of Information Known
Nicola J. Fedele	1 Prospect Street Kingston, NJ 08528	Noninfringement, invalidity and unenforceability of asserted U.S. Patent No. 4,813,056 ("the '056 patent"); ownership of the '056 patent.
William Squire	General Electric Company CRD Patent Docket RM 4A59 P.O. Box 8 Bldg. K-1 Salamone Schenectady, NY 12301	Noninfringement, invalidity and unenforceability of the '056 patent.
Allen L. Limberg	Patent Operations RCA Corporation P.O. Box 432 Princeton, NJ 08543	Noninfringement, invalidity and unenforceability of the '056 patent.

Name	Contact Information	Summary of Information Known
Fred Jacob	Patent Operations RCA Corporation P.O. Box 432 Princeton, NJ 08543	Noninfringement, invalidity and unenforceability of the '056 patent.
James C. Davis, Jr.	General Electric Company CRD Patent Docket RM 4A59 P.O. Box 8 Bldg. K-1 Salamone Schenectady, NY 12301	Noninfringement, invalidity and unenforceability of the '056 patent.
Paul R. Webb, II	General Electric Company CRD Patent Docket RM 4A59 P.O. Box 8 Bldg. K-1 Salamone Schenectady, NY 12301	Noninfringement, invalidity and unenforceability of the '056 patent.
RCA Corporation	P.O. Box 432 Princeton, NJ 08543	Noninfringement, invalidity and unenforceability of the '056 patent.
Mohammad S. Azam	35 Trinity Close, Kesgrave, Ipswich Suffolk, England 175 71B	Noninfringement, invalidity and unenforceability of U.S. Patent No. 4,860,103 ("the '103 patent"); ownership of the '103 patent.
Michael D. Carr	137 Kirton Road, Trimley St. Mary, Ipswich, Suffolk, England IP10 OQL	Noninfringement, invalidity and unenforceability of the '103 patent; ownership of the '103 patent.
Larry S. Nixon	Nixon & Vanderhye P.C. 2200 Clarendon Blvd. 14th Floor Arlington, VA 22201	Noninfringement, invalidity and unenforceability of the '103 patent.
Mark E. Nusbaum	Nixon & Vanderhye P.C. 2200 Clarendon Blvd. 14th Floor Arlington, VA 22201	Noninfringement, invalidity and unenforceability of the '103 patent.
Mark E. Vanderhye	Nixon & Vanderhye P.C. 2200 Clarendon Blvd. 14th Floor Arlington, VA 22201	Noninfringement, invalidity and unenforceability of the '103 patent.
B.G.W. Lloyd	British Telecommunications Intellectual Property Unit Room 1304 151 Gower Street London, England WC1E 6BA	Noninfringement, invalidity and unenforceability of the '103 patent.

Name	Contact Information	Summary of Information Known
British Telecommunications plc	81 Newgate Street, London, England EC1A 7AJ	Noninfringement, invalidity and unenforceability of the '103 patent.
General Electric Co.	P.O. Box 8 Schenectady, NY 12301	Noninfringement, invalidity and unenforceability of the asserted patents; licensing of the asserted patents; failure to mark products with asserted patent numbers; delay in bringing suit for alleged infringement of the asserted patents.
Principals and executives of PDIC	1530 S.S.W. Loop 323 Suite 124 Tyler, TX 75701 911 N.W. Loop 281 Suite 211-23 Longview, TX 75604	Licensing of the asserted patents; failure to mark products with asserted patent numbers; delay in bringing suit for alleged infringement of the asserted patents.
Microsoft Corp.	One Microsoft Way Redmond, WA 98052	Design, structure, function and operation of accused HP products that incorporates or uses Microsoft technology; licensing agreement between PDIC and Microsoft.
Palm, Inc.	950 W. Maude Ave. Sunnyvale, CA 94085	Design, structure, function and operation of accused Palm products.
Zoran Corp.	1390 Kifer Road Sunnyvale, CA 94086	Design, structure, function and operation of PM36 JPEG image processor chip used in some accused HP scanners.
LEAD Technologies, Inc.	1927 S. Tryon Street Suite 200 Charlotte, NC 28203	Design, structure, function and operation of JPEG encoding functionality on some HP scanners, inkjet and laser printers accused of infringing the '056 patent.
Analog Devices, Inc.	One Technology Way P. O. Box 9106 Norwood, MA 02062-9106	Design, structure, function and operation of Analog Devices AD9843A CCD Signal Processor in the HP products accused of infringing the '103 patent.

Name	Contact Information	Summary of Information Known
NEC Corp.	7-1, Shiba 5-chome Minato-ku, Tokyo 108-8001 Japan	Design, structure, function and operation of NEC CCD Signal Processor IC part number S10K01 in the HP products accused of infringing the '103 patent.
Dr. Dieter Preuss	Neue Koppel 31 D-24248 Moenkeberg, Germany Tel 0431-231562	Invalidity and unenforceability of the patents in suit; technical aspects and authentication of prior art.
Peter Segin	Schönkamp 20 24226 Heikendorf, Germany Tel +49 431 231876	Invalidity and unenforceability of the patents in suit; technical aspects and authentication of prior art.
Jerome Cox	7315 Albright Ave St. Louis, MO 63136-1228	Invalidity and unenforceability of the patents in suit; technical aspects and authentication of prior art.
Kenneth Ripley	27730 Coldsprings Pl. Valencia, CA 91354-1470	Invalidity and unenforceability of the patents in suit; technical aspects and authentication of prior art.
Michael Hankamer	7507 Moore House Ct. Manassas, VA 20111-2962	Invalidity and unenforceability of the patents in suit; technical aspects and authentication of prior art.
Wen Hsiung Chen	805 W. Duarte Rd. Ste 111 Arcadia, CA 91007	Invalidity and unenforceability of the patents in suit; technical aspects and authentication of prior art.
William Pratt	101 First St. Ste. 429 Los Altos, CA 94022	Invalidity and unenforceability of the patents in suit; technical aspects and authentication of prior art.
Dale R. DuVall	Oakwood, TX	Invalidity and unenforceability of the patents in suit; technical aspects and authentication of prior art.
Josef Raviv	Armonk, N.Y.	Invalidity and unenforceability of the patents in suit; technical aspects and authentication of prior art.

Name	Contact Information	Summary of Information Known
Martin de Loye	Versaille, France	Invalidity and unenforceability of the patents in suit; technical aspects and authentication of prior art.
Michel Beduchard	Palaiseau, France	Invalidity and unenforceability of the patents in suit; technical aspects and authentication of prior art.
Charles Weaver	Palo Alto, California	Invalidity and unenforceability of the patents in suit; technical aspects and authentication of prior art.
Joseph Chadwick	Menlo Park, California	Invalidity and unenforceability of the patents in suit; technical aspects and authentication of prior art.
Enrico Dolazza	Boston, Massachusetts	Invalidity and unenforceability of the patents in suit; technical aspects and authentication of prior art.
Robert LeBlanc	Montreal, Canada	Invalidity and unenforceability of the patents in suit; technical aspects and authentication of prior art.
Lawrence Sweeney, Jr.	Atherton, California	Invalidity and unenforceability of the patents in suit; technical aspects and authentication of prior art.
W.S. Michel	Murray Hill, New Jersey	Invalidity and unenforceability of the patents in suit; technical aspects and authentication of prior art.
W.O. Fleckenstein	Murray Hill, New Jersey	Invalidity and unenforceability of the patents in suit; technical aspects and authentication of prior art.
E.R. Kretzmer	Murray Hill, New Jersey	Invalidity and unenforceability of the patents in suit; technical aspects and authentication of prior art.
P.David Dodd	P.O. Box 8012 Avon, CO 81620	Invalidity and unenforceability of the patents in suit; technical aspects and authentication of prior art.

Name	Contact Information	Summary of Information Known
F.B. Wood	Los Gatos, California	Invalidity and unenforceability of the patents in suit; technical aspects and authentication of prior art.
James DiGiorgio	c/o Sean T. O'Kelly, Esq. O'Kelly Ernst & Bielle, LLC 901 N. Market Street, Suite 1000 Wilmington, DE 19801	Noninfringement, invalidity and unenforceability of the asserted patents; licensing of the asserted patents; failure to mark products with asserted patent numbers; delay in bringing suit for alleged infringement of the asserted patents.
Peter Emanuel	c/o Sean T. O'Kelly, Esq. O'Kelly Ernst & Bielle, LLC 901 N. Market Street, Suite 1000 Wilmington, DE 19801	Noninfringement, invalidity and unenforceability of the asserted patents; licensing of the asserted patents; failure to mark products with asserted patent numbers; delay in bringing suit for alleged infringement of the asserted patents.
Kenneth Glick	c/o Sean T. O'Kelly, Esq. O'Kelly Ernst & Bielle, LLC 901 N. Market Street, Suite 1000 Wilmington, DE 19801	Noninfringement, invalidity and unenforceability of the asserted patents; licensing of the asserted patents; failure to mark products with asserted patent numbers; delay in bringing suit for alleged infringement of the asserted patents.
Li-Fung Cheung	Altek Lab, Inc. 1411 W. 190th Street, Ste 475 Gardena, CA 90248	Design, structure, function and operation of accused HP products made by Altek.
Thomas Meager	Meagher Emanuel Laks Goldberg & Liao, LLP One Palmer Square, Ste 325 Princeton, NJ 08543 (609) 454-3500	Noninfringement, invalidity and unenforceability of the asserted patents; licensing of the asserted patents; failure to mark products with asserted patent numbers; delay in bringing suit for alleged infringement of the asserted patents.

Name	Contact Information	Summary of Information Known
Peter Moller	General Electric Company 3135 Easton Turnpike Fairfield, CT 06828	Noninfringement, invalidity and unenforceability of the asserted patents; licensing of the asserted patents; failure to mark products with asserted patent numbers; delay in bringing suit for alleged infringement of the asserted patents.
Custodian of Records Los Angeles Public Library, Central Library	630 W. 5th Street Los Angeles, CA 90071	Invalidity and unenforceability of the patents in suit; authentication and public availability of prior art.
Custodian of Records San Jose State University, Dr. Martin Luther King, Jr. Library	One Washington Square San Jose, CA 95192-0028	Invalidity and unenforceability of the patents in suit; authentication and public availability of prior art.
Custodian of Records UC Berkeley, University of California, Berkeley Kresge Engineering Library	110 Bechtel Engineering Center, #1796 Berkeley, CA 94720-1796	Invalidity and unenforceability of the patents in suit; authentication and public availability of prior art.
Custodian of Records UC Berkeley, Northern Regional Library Facility, Richmond Field Station	Building 400, Mead & South 47th Street Richmond, CA 94804-4698	Invalidity and unenforceability of the patents in suit; authentication and public availability of prior art.
Custodian of Records San Francisco Public Library, Main Library	100 Larkin Street San Francisco, CA 94102	Invalidity and unenforceability of the patents in suit; authentication and public availability of prior art.

HP reserves the right to rely on the disclosures of other defendants. HP reserves the right to identify additional persons and documents related to the invalidity of the patents-in-suit as part of its disclosure of HP's final invalidity contentions in this lawsuit. HP also reserves the right to modify or supplement the lists of persons disclosed above during discovery or otherwise during this action.